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6 Attorney for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 CARLOS GARCIA WELDON, SANDRA
JUDITH CASTANEDA CISNEROS, EDEL
15 FELIX CASTRO, AND FERMIN LOZANO
GONZALEZ,
16

Defendant.
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CASE NO. 1:19-CR-00274 NONE-SKO

STIPULATION AND ORDER BETWEEN THE
UNITED STATES AND DEFENDANTS AMANDA
JOY NASH

18 **STIPULATION**

19 WHEREAS, the discovery in this case is voluminous and contains personal information
20 including but not limited to personal identification numbers, dates of birth, financial account numbers,
21 telephone numbers, and residential addresses ("Protected Information"); and

22 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
23 unauthorized disclosure or dissemination of Protected Information to anyone not a party to the court
24 proceedings in this matter;

25 The parties agree that entry of a stipulated protective order is appropriate.

26 THEREFORE, defendants, by and through their counsel of record ("Defense Counsel"), and
27 plaintiff, the United States of America, by and through its counsel of record, hereby agree and stipulate
28 as follows:

1 1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, and its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
4 part of the discovery in this case (hereafter, collectively known as the “discovery”).

5 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any
6 documents that contain Protected Information with anyone other than Defense Counsel and designated
7 defense investigators and support staff. Defense Counsel may permit the defendant to view un-redacted
8 documents in the presence of Defense Counsel or under the supervision of Defense Counsel. The parties
9 agree that Defense Counsel, defense investigators, and support staff shall not allow the defendant to
10 copy Protected Information contained in the discovery. The parties agree that Defense Counsel, defense
11 investigators, and support staff may provide the defendant with copies of documents from which
12 Protected Information has been redacted.

13 4. The discovery and information therein may be used only in connection with the litigation
14 of this case and for no other purpose. The discovery is now and will forever remain the property of the
15 United States Government. Defense Counsel will return the discovery to the Government or certify that
16 it has been destroyed at the conclusion of the case.

17 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
18 ensure that it is not disclosed to third persons in violation of this agreement.

19 6. Defense Counsel shall be responsible for advising the defendants, employees, other
20 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

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7. In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order or the Court modifies this Order regarding such transfer of discovery.

IT IS SO STIPULATED.

Dated: February 5, 2020

McGREGOR W. SCOTT
United States Attorney

/s/ Melanie L. Alsworth
MELANIE L. ALSWORTH
Assistant United States Attorney

Dated: February 5, 2020

/s/ Preciliano Martinez
PRECILIANO MARTINEZ
Counsel for Defendant Weldon

Dated: February 10, 2020

/s/ Mark Coleman
MARK COLEMAN
Counsel for Defendant Cisneros

Dated: February 5, 2020

/s/ Arturo Hernandez
ARTURO HERNANDEZ
Counsel for Defendant Castro

Dated: February 6, 2020

/s/ Roger Bonakdar
ROGER BONAKDAR
Counsel for Defendant Lozano

ORDER

IT IS SO ORDERED.

Dated: **February 10, 2020**

Dale A. Inge
UNITED STATES DISTRICT JUDGE